

REMARKS

This Amendment is filed in response to the Office Action dated June 24, 2003, which has a shortened statutory period set to expire September 24, 2003. Applicants have amended Claims 1-20. No new matter is added. Applicants respectfully submit that Claims 1-20, as amended, are patentable over the cited art.

Specifically, Claim 1, as amended, now recites:

- a) placing cells of a circuit design by use of non-direct timing driven processes;
- b) providing routing information associated with said cells;
- c) performing an incremental placement of said cells using said routing information;
- d) placing said cells by use of direct timing driven placement processes; and
- e) repeating b) and c) after d) to optimize placement of said cells.

Applicants respectfully submit that Groenveld fails to disclose or suggest these limitations. Specifically, Groenveld teaches that a single detailed placement (Col. 6, lines 49-51) is performed after a coarse placement step that need not be timing driven (Col. 7, lines 20-22) and an electrical optimization step that includes satisfying predetermined timing constraints (Col. 6, lines 8-10). Because Groenveld fails to teach Applicants' recited method for placing circuit elements on an integrated circuit, Applicants request reconsideration and withdrawal of the rejection of Claim 1.

Claim 2 depends from Claim 1 and therefore is patentable for at least the reasons presented for Claim 1. Based on those reasons, Applicants also request reconsideration and withdrawal of the rejection of Claim 2.

Claim 3, as amended, now recites:

- a) placing cells of a circuit design by use of non-direct timing driven processes;
- b) routing wiring to connect said cells, thereby generating a layout;
- c) minimizing required signal timing within said layout;
- d) performing an incremental placement of said cells;
- e) placing said cells by use of direct timing driven placement processes; and
- f) repeating b), c), and d) after e) to optimize placement of said cells.

Applicant submits that Groenveld fails to disclose or suggest these limitations for at least the same reasons presented for Claim 1. Based at least on those reasons, Applicants request reconsideration and withdrawal of the rejection of Claim 3.

Claims 4-7 depends from Claim 3 and therefore are patentable for at least the reasons presented for Claim 3. Based on those reasons, Applicants also request reconsideration and withdrawal of the rejection of Claims 4-7.

Claim 8, as amended, now recites:

- a) placing cells of a circuit design by use of non-direct timing driven processes;
- b) routing wiring to connect said cells, thereby generating a layout;
- c) synthesizing said layout to optimize timing;
- d) performing an incremental placement of said cells based on said synthesizing;
- e) placing said cells by use of direct timing driven placement processes; and
- f) repeating b), c), and d) after e) to optimize placement of said cells.

Applicant submits that Groenveld fails to disclose or suggest these limitations for at least the same reasons presented for Claim 1. Based at least on those reasons,

Applicants request reconsideration and withdrawal of the rejection of Claim 8.

Claims 9-11 depends from Claim 8 and therefore are patentable for at least the reasons presented for Claim 8. Based on those reasons, Applicants also request reconsideration and withdrawal of the rejection of Claims 9-11.

Claim 12, as amended, now recites:

- a) synthesizing a high level description of a circuit to produce a circuit design;
  - b) placing cells of said circuit design by use of one of b1) non-direct timing driven processes and b2) direct timing driven processes;
  - c) routing wiring to connect said cells, thereby generating a layout;
  - d) modifying cell area allocations in said layout, if necessary to relieve congestion;
  - e) performing a post-layout synthesis optimization with said cells; and
  - f) providing an incremental placement of said cells,
- wherein one of b1) and b2) is performed during a pass including c), d), e), and f), wherein b1) is performed during a first pass, and wherein b2) is performed during any subsequent pass.

Applicant submits that Groenveld fails to disclose or suggest these limitations for at least the same reasons presented for Claim 1. Based at least on those reasons, Applicants request reconsideration and withdrawal of the rejection of Claim 12.

Claims 13-18 depends from Claim 12 and therefore are patentable for at least the reasons presented for Claim 12. Based on those reasons, Applicants also request reconsideration and withdrawal of the rejection of Claims 13-18.

Claim 19, as amended, now recites:

a processor coupled to a bus;  
a memory coupled to said bus and wherein  
said memory contains instructions that when  
executed implement a method for placing circuit  
elements on an integrated circuit, said method  
comprising the steps of:  
a) placing cells of a circuit design without  
regard to circuit timing;  
b) providing routing information associated  
with said cells;  
c) performing a detailed placement of said  
cells using said routing information;  
d) placing said cells by use of direct  
timing driven placement processes; and  
e) repeating b) and c) after d) to optimize  
placement of said cells.

Applicant submits that Groenveld fails to disclose or  
suggest these limitations for at least the same reasons  
presented for Claim 1. Based at least on those reasons,  
Applicants request reconsideration and withdrawal of the  
rejection of Claim 19.

Claim 20 depends from Claim 19 and therefore is patentable  
for at least the reasons presented for Claim 19. Based on those  
reasons, Applicants also request reconsideration and withdrawal  
of the rejection of Claim 20.


CONCLUSION

Claims 1-20 are pending in the present Application.  
Applicants respectfully request allowance of these claims.

If there are any questions, please telephone the  
undersigned at 408-451-5907 to expedite prosecution of this  
case.

Respectfully submitted,

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8/12/03      J. Harms  
Date                      Signature